

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997 : Docket No. R97-1
:

DMA MOTION FOR ADMISSION INTO EVIDENCE
AND INCORPORATION INTO THE RECORD OF MATERIAL
CROSS-REFERENCED BY USPS WITNESS O'HARA

Direct Marketing Association, Inc. ("The DMA") hereby respectfully moves that certain official USPS documents cross-referenced by USPS witness O'Hara in his answer to interrogatory DMA/USPS-T30-4 be admitted into evidence and transcribed into the record immediately following the witness' response.

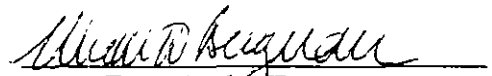
One of the interrogatories submitted by the DMA to USPS witness O'Hara, DMA/USPS-T30-4, asked for certain information relating to the deferability and service standards for the delivery of Standard (A) mail. In his answer, USPS witness O'Hara made reference to certain official USPS documents, specifically Postal Operations Manual 7 (POM 7) and a page from Attachment G to the USPS Request in this case. In order to avoid any lingering doubts about the evidentiary status of these cross-referenced documents, and for the future convenience of the Commission and all parties, the DMA believes that it would be appropriate for the Commission to rule (i) that these documents be admitted into evidence and (ii) that they be transcribed into the record immediately following the interrogatory response that makes reference to them.

Accordingly, the DMA has included in the documents submitted to the

Commission along with its designation of written cross-examination of Witness O'Hara copies of the crossed-referenced documents.

Counsel for the Postal Service has authorized the undersigned counsel to state that it has no objection to this motion. Absent an objection from another party, DMA believes that the attached documentation should be included in the packet of written cross-examination prepared by the Commission's staff and transcribed into the record when witness O'Hara takes the stand. If any party does raise an objection, the DMA would be prepared to address the merits of this motion at the hearing.

Respectfully submitted,


Dana T. Ackerly II
David L. Meyer
Michael D. Bergman
COVINGTON & BURLING
1201 Pennsylvania Avenue, N.W.
P.O. Box 7566
Washington, D.C. 20044
(202) 662-5296

Counsel for the Direct Marketing
Association, Inc.

Dated: October 1, 1997

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Commissioner's Rules of Practice, as modified by the Special Rules of Practice.


Michael D. Bergman

Dated: October 1, 1997